



March 9, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

REDACTED – FOR PUBLIC INSPECTION

**Re: Request for Confidential Treatment Pursuant to 47 C.F.R. §§ 0.457 and 0.459
for Materials Contained in *Structure and Practices of the Video Relay Service
Program* Comments (CG Docket Nos. 03-123, 10-51)**

Dear Ms. Dortch:

Through counsel, Sorenson Communications, Inc. (“Sorenson”) hereby requests pursuant to Sections 0.457 and 0.459 of the Commission’s rules, 47 C.F.R. §§ 0.457, 0.459, that the Commission withhold from any future public inspection and accord confidential treatment to Sorenson’s attached *Structure and Practices of the Video Relay Service Program* Comments.¹ This document contains sensitive commercial information—namely, its call center management and operating strategies; staffing levels, training and strategies; research and development, G&A, and engineering costs; call volume and distribution; speed-of-answer data; and licensing costs—that falls within Exemption 4 of the Freedom of Information Act (FOIA). *See* 5 U.S.C. § 552(b)(4).

Exemption 4 of FOIA provides that the public disclosure requirement of the statute “does not apply to matters that are ... (4) trade secrets and commercial or financial information obtained from a person and privileged or confidential.” 5 U.S.C. § 552(b)(4). Because Sorenson is providing commercial information “of a kind that would customarily not be released to the public,” this information is “confidential” under Exemption 4 of FOIA. *See Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992).

In support of this request and pursuant to Section 0.459(b) of the Commission’s rules, Sorenson hereby states as follows:

¹ Counsel is filing an original and one copy of this letter and its confidential attachment in hard copy. Sorenson is also electronically filing a copy of this letter and a redacted version of the attachment for inclusion in the public record in the dockets identified above.

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1. Identification of the Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))

Sorenson seeks confidential treatment with respect to information regarding its call center management and operating strategies; staffing levels, training and strategies; research and development, G&A, and engineering costs; call volume and distribution; average speed-of-answer; and licensing costs. This information has been redacted from the public version.

2. Description of the Circumstances Giving Rise to the Submission (Section 0.459(b)(2))

Sorenson is submitting this information in response to the Commission's proposals to reform the Video Relay Service ("VRS") program.

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))

The data described above constitutes sensitive commercial information, and is customarily guarded from competitors. In particular, information related to call center management and operating strategies; staffing levels, training and strategies; research and development, G&A, and engineering costs; call volume and distribution; average speed-of-answer; and licensing costs constitute closely guarded information that, if released, would disadvantage Sorenson by providing its competitors with an insight into Sorenson's operations.

4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))

The VRS market is highly competitive throughout the United States.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))

Sorenson could be harmed by unauthorized disclosure of this information, as it could provide competitors with commercially sensitive insights related to Sorenson's operations.

6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b)(6))

Sorenson does not make the redacted information publicly available.

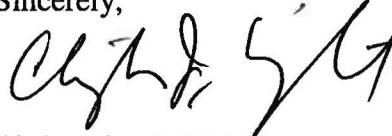
7. Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (Section 0.459(b)(7))

Sorenson does not make the redacted information publicly available.

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**Subject to Request for Confidential Treatment
Pursuant to 47 C.F.R. §§ 0.457, 0.459**

Sincerely,

A handwritten signature in black ink, appearing to read "CJ Wright", with a large, stylized flourish at the end.

Christopher J. Wright,

Counsel to Sorenson Communications, Inc.

Attachment